

# Federal Defenders OF NEW YORK, INC.

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## **BY ECF**

Honorable Paul Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Joshua Adam Schulte*  
17 Cr. 548 (PAC)**

Dear Judge Crotty:

The defense respectfully requests that the Court halt jury deliberations temporarily and conduct an individual *voir dire* of jurors 2–11 to ensure that they were not exposed to prejudicial extra-record information from former Juror 5. Such an inquiry is necessary because the Court currently only has the information received in the robing room from Juror 1 and former Juror 5. *See United States v. Gaggi*, 811 F.2d 47, 52 (2d Cir. 1987) (noting that the district court held, not one but two, *voir dires* of each juror ...to determine the extent of the juror's exposure" to extrajudicial information).

Thank you.

Respectfully submitted,

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/s/

Sabrina Shroff  
Edward Zas  
Attorneys for Joshua Schulte

cc: Government counsel (by ECF)